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18     Attorneys for Defendant SUNGAGE FINANCIAL LLC

19     CAMERON BEATTY, individually  
20     and on behalf of all others similarly  
21     situated,

22     Plaintiff,

23     v.

24     SUNGAGE FINANCIAL, LLC, a  
25     Massachusetts limited liability  
26     company; NBT BANK, N.A., a New  
27     York Corporation; SUNMADE  
28     ENERGY, LLC, a California limited  
   liability company; and DOES 1  
   through 50, inclusive,

29     Defendants.

30     Case No. 1:25-cv-00645-KES-SKO

31     **Joint Stipulation AND ORDER for  
32     defendants to RESPOND TO  
33     AMENDED COMPLAINT**

34     **(Doc. 28)**

35     Filing Date:        August 15, 2025  
36     Trial Date:        None set

1 Plaintiff Cameron Beatty and Defendants Sungage Financial, LLC (“Sungage”);  
2 and NBT Bank, N.A. (“NBT”) (collectively “Defendants”), by and through their  
3 counsel, hereby make the following stipulations regarding the deadline for Defendants  
4 to respond to Plaintiff’s Amended Complaint.

5 1. WHEREAS, on August 18, 2025, the Parties filed a Joint Stipulation  
6 and Proposed Order that included language stating that Plaintiff shall have until  
7 September 30, 2025 to file an amended complaint (Dkt. No. 24);

8 2. WHEREAS the Joint Stipulation and Proposed Order filed on August 18,  
9 2025 also included language that Defendants deadline to respond to the amended  
10 complaint would be October 30, 2025 (Dkt. No. 24);

11 3. WHEREAS on August 18, 2025, the Court entered an Order granting that  
12 stipulation (Dkt. No.25);

13 4. WHEREAS Plaintiff did not file his amended complaint until October 22,  
14 2025 (Dkt. No. 27);

15 5. WHEREAS the Parties have agreed that Defendants’ new deadline to respond  
16 to the amended complaint should be November 21, 2025;

17 6. THEREFORE, subject to the Court’s approval, the Parties HEREBY  
18 STIPULATE that Defendants’ deadline to respond to the amended complaint is  
19 November 21, 2025.

21 Dated: October 30, 2025

**LAW OFFICES OF JASON M. INGBER**

23 By: /s/ Jason M. Ingber (with email authorization)  
24 Jason M. Ingber  
25 Serach B. Shafa  
26 Attorneys for Plaintiff  
27 Cameron Beatty

1 Dated: October 30, 2025

**WIECHERT, MUNK & GOLDSTEIN, PC**

2  
3 By: /s/Jessica Munk  
4 Jessica C. Munk  
5 David W. Wiechert  
Attorneys for Defendant  
Sungage Financial, LLC

6  
7 Dated: October 30, 2025

**MURPHY & KING**

8  
9 By: /s/ Dan Rabinovitz (with email authorization)  
10 Daniel J. Goodrich, PHV  
11 Daniel M. Rabinovitz, PHV  
Attorneys for Defendant  
Sungage Financial, LLC

12  
13 Dated: October 30, 2025

**ALSTON & BIRD LLP**

14  
15 By: /s/David Carpenter (with email authorization)  
16 Tracy Yao  
17 David B. Carpenter, PHV  
Kelley Connolly Barnaby, PHV  
18 Attorneys for Defendant  
NBT BANK, N.A.

## **ORDER**

Based on the Parties' foregoing Stipulation (Doc. 28), and good cause appearing, the Court hereby ORDERS that Defendants' deadline to respond to the amended complaint is **November 21, 2025**.

IT IS SO ORDERED.

Dated: **October 31, 2025**

*/s/ Sheila K. Oberto*

**UNITED STATES MAGISTRATE JUDGE**